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IN THE MATTER OF QWEST
CORPORATION'S COMPLIANCE
WITH § 271 OF THE
TELECOMMUNICATIONS ACT OF
1996

QWEST CORPORATION'S
SEVENTH (3Q/04) QUARTERLY
FILING OF ACTUAL CLEC EDI
RESPONSE TIMES

DOCKET NO. T-00000A-97-0238

Qwest Corporation (Qwest) hereby provides aggregated actual CLEC EDI response times for the months of July, August and September 2004, produced in compliance with the Arizona Corporation Commission Staff's Impasse Issue #940 Resolution: Use of IRTM for PID PO-1B. In this resolution, Staff required Qwest to develop the capability to report actual CLEC Pre-Order/Order Response Times for EDI transactions at Qwest's Interactive Agent (IA) by year end 2002, and to track these results with PO-1B until the 18 and/or 24 month review, at which time a decision will be made whether to modify the PIDs to utilize EDI response times as measured at the Qwest IA.¹

On February 12, 2003, Qwest filed its Notice of Compliance Regarding CLEC Actual EDI Response Times (Notice of Compliance), confirming that Qwest had

¹ Staff's Impasse #940 resolution: Use of IRTM for PID PO-1B at section E.

developed the required capability to report actual CLEC Pre-Order/Order response times for EDI transactions and proposing that the monthly aggregated results be reported on a quarterly basis until the 18 and/or 24 month review. Accordingly, Qwest submits this seventh quarterly filing of CLEC aggregated EDI response times. The results for each month in the third quarter of 2004 are listed below.

Transactions for CLECs on all Releases Compared to IRTM Transactions - July 2004								
CLEC	TRANS_TYPE	CLEC	Avg.	Avg. IA	Avg. IA	CLEC Avg - IA Process	IRTM	Differences
		Obs.	Time (1)	Process Time	Process Time	(1) - (2) - (3)	Avg.	
				(Inbound) (2)	(Outbound) (3)		Time (4)	
All CLECs (Excluded all Internal Trading Partners (IRTM))	ADDRVAL	148962	6.04	1.691	0.554	3.795	1.73	2.065
	SERVAVAIL	0	N/A	N/A	N/A	N/A	6.84	N/A
	CSR	173463	7.066	1.318	0.6	5.148	2.83	2.318
	APPTSCHED	5099	5.671	2.368	0.157	3.146	3.82	-0.674
	TN	9115	8.032	2.43	0.13	5.472	5	0.472
	FACCHECK	5998	10.666	2.506	0.13	8.03	6.04	1.99
	LOOPQUALTOOL S	1824	10.195	0.753	0.202	9.24	9.72	-0.48
	RESALELOOPQU AL	0	N/A	N/A	N/A	N/A	8.73	N/A
	CFA	3072	8.201	0.45	0.289	7.462	9.24	-1.778
	MPQ	0	N/A	N/A	N/A	N/A	5.65	N/A

Transactions for CLECs on all Releases Compared to IRTM Transactions - August 2004								
CLEC	TRANS_TYPE	CLEC	Avg.	Avg. IA	Avg. IA	CLEC Avg - IA Process	IRTM	Differences
		Obs.	Time (1)	Process Time	Process Time	(1) - (2) - (3)	Avg.	
				(Inbound) (2)	(Outbound) (3)		Time (4)	
All CLECs (Excluded all Internal Trading Partners (IRTM))	ADDRVAL	167051	5.644	1.541	0.407	3.696	1.79	1.906
	SERVAVAIL	0	N/A	N/A	N/A	N/A	7.26	N/A
	CSR	170704	6.473	0.889	0.488	5.096	2.99	2.106
	APPTSCHED	6579	5.583	2.351	0.141	3.091	3.69	-0.599
	TN	12310	8.412	2.429	0.128	5.855	5.85	0.005
	FACCHECK	7634	10.944	2.493	0.119	8.332	6.04	2.292
	LOOPQUALTOOL S	1711	9.844	0.765	0.588	8.491	10.25	-1.759
	RESALELOOPQUA L	4	12.277	0.459	1.456	10.362	9.88	N/A
	CFA	3867	7.842	0.451	0.316	7.075	9.46	-2.385
	MPQ	0	N/A	N/A	N/A	N/A	5.08	N/A
Transactions for CLECs on all Releases Compared to IRTM Transactions - September 2004								
CLEC	TRANS_TYPE	CLEC	Avg.	Avg. IA	Avg. IA	CLEC Avg - IA Process	IRTM	Differences
		Obs.	Time (1)	Process Time	Process Time	(1) - (2) - (3)	Avg.	
				(Inbound) (2)	(Outbound) (3)		Time (4)	
All CLECs (Excluded all Internal Trading Partners (IRTM))	ADDRVAL	157027	6.191	1.681	0.775	3.735	1.83	1.905
	SERVAVAIL	0	N/A	N/A	N/A	N/A	7.36	N/A
	CSR	151847	6.966	1.051	0.876	5.039	3.01	2.029
	APPTSCHED	5679	5.672	2.317	0.128	3.227	3.91	-0.683
	TN	11188	7.763	2.411	0.118	5.234	5.26	-0.026
	FACCHECK	6627	10.103	2.487	0.131	7.485	6	1.485
	LOOPQUALTOOL S	2170	10.394	0.788	1.338	8.268	9.07	-0.802
	RESALELOOPQUA L	0	N/A	N/A	N/A	N/A	10.31	N/A
	CFA	3257	7.764	0.43	0.325	7.009	9.56	-2.551
	MPQ	0	N/A	N/A	N/A	N/A	5.13	N/A

1
2 The results show aggregated CLEC actual response times with and without IA processing
3 time. Please note that N/A stands for not applicable and indicates that no CLEC issued those
4 types of queries during the month. As stated in the Notice of Compliance, Qwest is providing the
5 results in this manner to allow for an accurate comparison of the results from actual transactions
6 with results from IRTM transactions, since the processing time at the IA, as captured in actual
7 transactions, is directly impacted by a CLEC's selection of hardware and software.
8

9
10 As Qwest has previously stated, the type of hardware a CLEC chooses can directly impact
11 the transaction measurements. For example, if a CLEC uses nonstandard configurations, a slower
12 server, or slower than normal network connections, then that CLEC's results will be much greater
13 than those of a CLEC using more efficient hardware. Additionally, because the time period
14 measured does not end until Qwest receives an acknowledgement from the CLEC, the response
15 time will be longer if a CLEC's IA takes longer to send the acknowledgement. Further, it is
16 possible for a CLEC to structure certain queries in a way that increases the processing time, *e.g.*,
17 by including multiple lines in a single ADSL Loop Qualification query.
18

19 Qwest has excluded response times from IMA's internal production load, release and pre-
20 start testing. These transactions are similar to Qwest's internally generated IRTM transactions,
21 except they are used to verify a major release, check systems performance and load levels, or
22 pretest all systems during system maintenance windows before accepting co-provider
23 transactions. Since these transactions are easily identified due to the unique co-provider identifiers
24 used and are not CLEC transactions, they are not included in the quarterly measurements. Any
25
26

1 active production co-provider sending data during a production load test would still have all their
2 data measurements reported.

3 In conclusion, Qwest has complied with the Staff's Impasse Resolution to develop the
4 capability to measure actual EDI transactions by year-end 2002.

5 Qwest now provides, with this filing the results for the third quarter of 2004.
6

7
8 RESPECTFULLY SUBMITTED this 27th day of October, 2004.

9
10 By: 

11 Norman G. Curtright, Esq.
12 QWEST SERVICES CORPORATION
13 4041 N. Central Avenue, Suite 1100
14 Phoenix, Arizona 85012
15 Telephone: (602) 630-2187
16 Facsimile: (602) 235-3107

17 - and -

18 Timothy Berg, Esq.
19 FENNEMORE CRAIG, P.C.
20 3003 N. Central Avenue, Suite 2600
21 Phoenix, Arizona 85012
22 Telephone: (602) 916-5421

23 ATTORNEYS FOR QWEST CORPORATION
24
25
26

27 ORIGINAL and 15 copies hand-delivered
28 for filing October 27th, 2004, to:

29 Docket Control
30 ARIZONA CORPORATION COMMISSION
31 1200 West Washington Street
32 Phoenix, AZ 85007

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Phoenix, AZ 85007
5
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this 27th day of October, 2004 to:
7
8 Maureen A. Scott
9 Legal Division
10 ARIZONA CORPORATION COMMISSION
11 1200 W. Washington St.
12 Phoenix, AZ 85007
13 Ernest G. Johnson, Director
14 Utilities Division
15 ARIZONA CORPORATION COMMISSION
16 1200 W. Washington St.
17 Phoenix, AZ 85007
18 Lyn Farmer, Chief Administrative Law Judge
19 Jane Rodda, Administrative Law Judge
20 Hearing Division
21 ARIZONA CORPORATION COMMISSION
22 1200 W. Washington
23 Phoenix, AZ 85007
24
25 COPY of the foregoing mailed
this 27th day of October, 2004 to:
26
27 Eric S. Heath
28 SPRINT COMMUNICATIONS CO.
29 100 Spear Street, Suite 930
30 San Francisco, CA 94105
31
32 Thomas Campbell
33 LEWIS & ROCA
34 40 N. Central Avenue
35 Phoenix, AZ 85004
36
37 Joan S. Burke
38 OSBORN MALEDON, P.A.
39 2929 N. Central Ave., 21st Floor
40 PO Box 36379
41 Phoenix, AZ 85067-6379
42
43
44
45
46

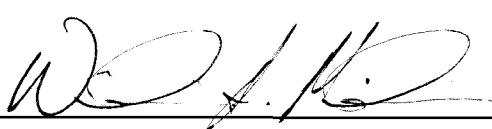
1 Thomas F. Dixon
WORLD COM, INC.
2 707 N. 17th Street #3900
Denver, CO 80202
3
4 Scott S. Wakefield
RUCO
1110 West Washington, Suite 220
5 Phoenix, AZ 85007
6 Michael M. Grant
Todd C. Wiley
7 GALLAGHER & KENNEDY
2575 E. Camelback Road
8 Phoenix, AZ 85016-9225
9 Michael Patten
ROSHKA, HEYMAN & DEWULF
10 400 E. Van Buren, Ste. 900
Phoenix, AZ 85004-3906
11 Mark DiNuzio
12 COX COMMUNICATIONS
20402 North 29th Avenue
13 Phoenix, AZ 85027-3148
14 Daniel Waggoner
DAVIS, WRIGHT & TREMAINE
15 2600 Century Square
1501 Fourth Avenue
16 Seattle, WA 98101
17 Traci Grundon
DAVIS, WRIGHT & TREMAINE
18 1300 S.W. Fifth Avenue
Portland, OR 97201
19 Richard S. Wolters
20 Maria Arias-Chapleau
AT&T Law Department
21 1875 Lawrence Street, #1575
Denver, CO 80202
22 Diane Bacon, Legislative Director
23 COMMUNICATIONS WORKERS OF AMERICA
5818 N. 7th St., Ste. 206
24 Phoenix, AZ 85014-5811
25 Philip A. Doherty
545 S. Prospect Street, Ste. 22
26 Burlington, VT 05401

- 1 W. Hagood Bellinger
4969 Village Terrace Drive
2 Dunwoody, GA 30338
- 3 Joyce Hundley
U.S. DEPARTMENT OF JUSTICE
4 Antitrust Division
1401 H Street N.W. #8000
5 Washington, DC 20530
- 6 Andrew O. Isar
TELECOMMUNICATIONS RESELLERS ASSOC.
7 4312 92nd Avenue, NW
Gig Harbor, WA 98335
- 8 Raymond S. Heyman
9 ROSHKA, HEYMAN & DEWULF
400 N. Van Buren, Ste. 800
10 Phoenix, AZ 85004-3906
- 11 Thomas L. Mumaw
SNELL & WILMER
12 One Arizona Center
Phoenix, AZ 85004-0001
- 13 Mike Allentoff
14 GLOBAL CROSSING SERVICES, INC.
1080 Pittsford Victor Road
15 Pittsford, NY 14534
- 16 Michael Morris
Allegiance Telecom of Arizona, Inc.
17 505 Sansome Street, 20th Floor
San Francisco, CA 94111
- 18 Gary L. Lane, Esq.
19 6902 East 1st Street, Suite 201
Scottsdale, AZ 85251
- 20 Kevin Chapman
21 SBC TELECOM, INC.
1010 N. St. Mary's, Room 1234
22 San Antonio, TX 78215-2109
- 23 Richard Sampson
Z-TEL COMMUNICATIONS, INC.
24 601 S. Harbour Island, Ste. 220
Tampa, FL 33602
- 25
26

1 Megan Doberneck
COVAD COMMUNICATIONS COMPANY
2 7901 Lowry Boulevard
Denver, CO 80230
3
4 Richard P. Kolb
Vice President of Regulatory Affairs
ONE POINT COMMUNICATIONS
5 Two Conway Park
150 Field Drive, Ste. 300
6 Lake Forest, IL 60045
7 Attorney General
OFFICE OF THE ATTORNEY GENERAL
8 1275 West Washington
Phoenix, AZ 85007
9
10 Steven J. Duffy
RIDGE & ISAACSON, P.C.
3101 North Central Ave., Ste. 1090
11 Phoenix, AZ 85012
12 Karen Clauson
ESCHELON TELECOM
13 730 Second Avenue South, Ste. 1200
Minneapolis, MN 55402
14
15 Curt Huttsell
State Government Affairs
Electric Lightwave, Inc.
16 4 Triad Center, Suite 200
Salt Lake City, UT 84180
17
18 Brian Thomas
Time Warner Telecom, Inc.
223 Taylor Avenue North
19 Seattle, WA 98109
20 David Kaufman
ESPIRE Communications
21 1129 Paseo De Peralta
Santa Fe, NM 87501
22
23 Mitchell F. Brecher
Greenberg Traurig, LLP
800 Connecticut Avenue, NW
24 Washington, DC 20006
25
26

1 Tobin Rosen
Principal Asst. City Attorney
2 Office of the Tucson City Attorney
255 W. Alameda- Seventh Floor West
3 Tucson, AZ 85701

4 Patrick A. Clisham
AT&T Arizona State Director
5 320 E. Broadmoor Court
Phoenix, AZ 85022
6
7
8

9 
10 _____

11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26